

Exhibit D

Weil, Gotshal & Manges LLP

767 Fifth Avenue
New York, NY 10153-0119
+1 212 310 8000 tel
+1 212 310 8007 fax

Richard W. Slack
+1 (212) 310-8017
richard.slack@weil.com

BY E-MAIL

August 14, 2013

Bruce E. Clark, Esq.
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004

Re: Lehman Brothers Holdings, Inc., et al., Case No. 08-13555 (JMP)

Dear Bruce:

I write on behalf of Lehman Brothers Special Financing Inc. ("LBSF") and Lehman Brothers Holdings Inc. ("LBHI," and together with LBSF, "Lehman") pursuant to the discovery protocol among Lehman and Giants Stadium LLC ("Giants Stadium"), dated April 1, 2013 (the "Protocol") and the May 14, 2013 deadlines (as extended) thereunder for notice of party depositions and identification of third-party deponents.

We currently do not intend to take any additional party or third-party depositions in connection with our Rule 2004 investigation. This position is subject to change and we reserve our rights under the Protocol or otherwise to seek depositions or documents from persons listed or not listed below. We expressly reserve all rights as set forth in the Protocol or otherwise to take depositions in any litigation or claims objection proceeding, which may include depositions of the following persons (which does not include former employees or agents of LBHI or LBSF):

Party Deponents

Christine Procops
John Mara
Steve Tisch
One or more additional representatives of Giants Stadium

Non-Party Deponents

Joe Siclare
Joseph Shenker
Andrew Dietderich

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One or more current or former employees, and a representative, of Goldman Sachs & Co.
One or more employees or representatives of the National Football League Inc. (the "NFL")
Past and present members of the Finance Committee of the NFL
One or more representatives of Financial Security Assurance, Inc.
One or more representatives of Financial Guaranty Insurance Company
One or more representatives of The Baupost Group, L.L.C.
One or more representatives of Bank of America Corporation
One or more current or former employees or agents of Lehman Brothers Inc.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Slack', with a stylized flourish extending from the end.

Richard W. Slack

Cc: Matthew A. Schwartz
Lara J. Loyd
Thomas Hommel